

## **CONFIDENTIALITY POLICY**

### **APPLICATION AND CONSENT**

Personal information of individuals-users of Fitnation.kz website and Fitnation mobile application are processed by FitnessLink LLP ("FitnessLink"), located at: 259, Rozybakiyev str., Almaty, Republic of Kazakhstan, 050060 (further the Partnership). The Partnership is the owner and operator of the database of personal information of Fitnation.kz users and Fitnation mobile application.

Personal database of Fitnation.kz and Fitnation mobile application users is at the location of the Partnership.

This Confidentiality Policy describes the order of processing of personal data collected with help of Fitnation.kz (hereinafter referred to as Website), Fitnation mobile application (hereinafter - mobile application) and related services and tools on the Website. In all the above-mentioned cases, the Partnership processes users' personal data solely within the requirements of the Law of the Republic of Kazakhstan dated May 21, 2013 No.94-V - On personal data and their protection, as well as international contracts ratified by the Republic of Kazakhstan, Rules and other generally applicable legal norms.

This Confidentiality Policy is developed in accordance with their norms.

Users shall be aware that when they click on certain links on the Website or mobile application, they may be redirected to websites (applications, etc.) of other companies outside of the Partnership's hosting space ("Facebook", "google+", "VKontakte"), where information about Users is collected outside of the Partnership's direct control. In such a case, the Confidentiality Policies of websites and/or applications of third parties will regulate the order of processing of information received from Users by these third parties.

### **INFORMATION COLLECTED, RECEIVED AND POSTED BY THE PARTNERSHIP**

If a user chooses to log in to the Website, mobile application using a third-party operator's authentication service, such as Facebook information, the Partnership may obtain additional profile, or other information accessed by such third party.

Customer Service: When contacted by Users, the Partnership may - as part of the operations of its Website - collect personal information necessary to fulfill a User's request and to obtain feedback if necessary. The Partnership may also contact the User using existing account contact information provided for this purpose. The Partnership may also collect other information about communications with Users, such as any support requests submitted by Users, or any feedback provided by them.

Website and Mobile Data: the Partnership may automatically receive and record on its servers information from a User's browser or any device, including IP address, software and hardware attributes, pages requested by the User, mobile identifiers, application usage information, and/or information about other devices in use, or system-level information. This may occur on the Website or on the mobile app, or on third party services.

### **IP ADDRESS, COOKIES and MOBILE IDENTIFICATORS**

As part of the activities of its Website, mobile application, the Partnership may collect certain information through technologies such as cookies, pixels, and local storage (as in your browser or mobile device).

**COOKIES** are small text files that store information directly on the user's computer, cell phone or other device.

Pixels are small digital images that are part of codes on Web pages that allow another server to measure the crawlability of a Web page, and are often used in conjunction with cookies. The code tracks if and when (and on which page) a pixel is loaded to indicate that a user is interacting with a page or part of a page on the Website.

Cookies serve, among other things, to make using the Website more convenient.

### **USE OF PERSONAL DATA**

In order to provide its services, the Partnership may use information that the Partnership collects and places for the following purposes:

to provide customer service, including creating and managing user accounts, resolving technical difficulties and access to various functions;

to adapt offers and experiences, including advertising on its services or those of third parties;

to monitor general and individual User activity and manage traffic on the Website;

to communicate with users, including service issues, customer service or allowed marketing communications through the other accessible communication channels;

conducting research and analytical activities to improve our service; and

ensuring compliance with the conditions of the concluded Contract.

The Partnership may retain the information it collects and receives on its Website, mobile app for as long as necessary to fulfill the above business purposes.

### **INFORMATION SHARING**

The Partnership may share the information it collects with affiliates, partners. Thus the transferred data remains a subject of the Confidentiality Policy.

The Partnership does not share users' personal information with non-affiliates.

The Partnership reserves the right, as required by law, to exchange information with private individuals and governmental authorities for the following purposes:

to investigate suspected violations of law or to deal with any other suspected violations of the Contract conditions by Users.

The Partnership may provide personal data of Users upon requests of competent authorities executed in accordance with the requirements of the legislation of the Republic of Kazakhstan.

In accordance with the Confidentiality Policy, the Partnership is obliged not to lease or sell any personal data of Users. In the event that the Partnership's business or a part of that business is sold or reorganized, and Partnership transfers all or substantially all of its assets to a new owner, User personal data may be transferred to the buyer to ensure the continuity of the Website, mobile application service.

The Partnership may transfer certain anonymized information (data that does not identify Users individually) to third-party service providers, trusted partners or authorized researchers in order to better understand what advertising or services might interest Users, to improve the overall quality and effectiveness of services on the Website, mobile app or to provide its contribution to research that the Partnership believes could yield greater social benefits.

In cases of personal data transfers, informing the User of the transfer of their personal data is left to the discretion of the Partnership.

## **USER CONTROL**

**Access, Correction and Deletion:** the User can disable, or change account data through identification settings. Posted information can be modified or deleted in the user's personal account " \_\_\_\_\_ " on the web page of the Website, or in the mobile application.

**Cookies:** Most major computer (desktop) and mobile web browsers (e.g. Safari, Firefox, Internet Explorer, Chrome, Opera) provide controls that allow the user to limit or block the installation of cookies on your systems. Please note that disabling Cookies for Category 1 domains (visited websites) and other domains (websites associated with visited ones) may, in some cases, result in limited functionality for those websites.

Other rights of Users in connection with processing of their personal data by the Partnership:

to know about availability of their personal data at the Partnership and the third party, as well as to receive information containing: confirmation of the fact, purpose, sources, methods of collection and processing of personal data; list of personal data; terms of processing of personal data, including terms of their storage;

to send request to the Partnership as well as to the third party to destroy its personal data, collection and processing of which was made with violation of legislation of the Republic of Kazakhstan, as well as in other cases stipulated by regulatory legal acts of the Republic of Kazakhstan;

to withdraw consent to collection, processing of personal data, except for cases provided by the item 2 of article 8 of the Law of the Republic of Kazakhstan - On Personal Data and Their Protection;

to protect their rights and legitimate interests, including compensation for moral and material harm;

to exercise other rights stipulated by this Law of the Republic of Kazakhstan.

## **SECURITY**

All information the Partnership collects is reasonably protected by technical means and security procedures in order to prevent unauthorized access or use of the data. The Partnership's affiliates, partners and third-party service providers are committed to using the information they receive from the Partnership in a manner consistent with security requirements and this Confidentiality Policy.

## **AMENDMENTS TO THE POLICY**

The Partnership may update this Confidentiality Policy from time to time, a revised Confidentiality Policy will be effective upon posting on the Internet at the address listed in this item, unless otherwise provided in the revised Confidentiality Policy. The current version of Confidentiality Policy is always on the page in the Confidentiality Policy section, on the Website or mobile application.

If the Partnership made any amendments in Confidentiality Policy, which the User does not agree with, it is obliged to stop using the services of the Website, mobile application.

The fact of non-termination of use of the Website, mobile application is the confirmation of consent and acceptance by the User of the corresponding edition of Confidentiality Policy.